

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: GE/CBPS DATA BREACH LITIGATION

Case No. 1:20-cv-02903-KPF

**NOTICE OF MOTION TO
DISMISS CONSOLIDATED
CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that upon: (i) their Memorandum of Law in Support of their Motion to Dismiss the Consolidated Class Action Complaint (the “Complaint”); (ii) the Declaration of James Allen, dated October 12, 2020 and attached exhibit; and (iv) all prior proceedings and pleadings in this action, Defendants Canon Business Process Services, Inc. and General Electric Company will move this Court before the Honorable Katherine Polk Failla, United States District Judge, Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York 10007, for an Order dismissing the Complaint in its entirety with prejudice pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), and granting such other and further relief as the Court may deem just and proper.

Dated: January 21, 2021
New York, New York

Respectfully submitted,

/s/ Kenneth L. Chernof

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